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February 28, 2025

**VIA ECF**

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 1007

Re: Joseph Srour v. City of New York, et. al.,  
22-CV-0003 (JPC)

Your Honor:

I am the Assistant Corporation Counsel assigned to represent the defendants in the above-entitled action. I write, with the consent of plaintiff's counsel, to respectfully request a one-week enlargement of time to file the parties' end-of-discovery update with the Court. This is the second request for such an extension.

By Order dated November 26, 2024, the deadline to complete discovery on damages was set for January 31, 2025 and the parties were directed to file an update and proposed schedule for next steps on February 3, 2025. Thereafter, on February 3, 2025, the Court granted the first request for an enlargement of time to complete discovery, until March 3, 2025 and to file the update letter, until March 5, 2025. Discovery is substantially complete, with the exception of a few outstanding pieces of information and documents which were identified yesterday at plaintiff's deposition. Defendants are now requesting an additional seven days to file the parties' update letter to permit me time to have the discussions with the client and within my office necessary to provide the Court with defendants' specific proposed next steps. The time will also allow me to have these internal conversations before conferring with plaintiffs' counsel regarding the substance of the letter to the Court.

Accordingly, defendants respectfully request an enlargement of time until March 12, 2025 to file an update letter with the Court. I thank the Court for its attention to this request.

Respectfully Submitted,

/S

Aimee K. Lulich

cc: Amy Bellantoni, Esq. (By ECF)

The request is granted. The parties' deadline to file the post-discovery status letter in this matter is extended to March 12, 2025. The Clerk of Court is respectfully directed to close Docket Number 59.

SO ORDERED.

Date: March 3, 2025

New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN  
United States District Judge